



One Lincoln Center | Syracuse, NY 13202-1355 | [bsk.com](http://bsk.com)

**LIZA R. MAGLEY**  
[lmagley@bsk.com](mailto:lmagley@bsk.com)  
P: 315.218.8226

June 21, 2022

**VIA ELECTRONIC FILING**

Hon. Frederick J. Scullin, Jr.  
Senior U.S. District Judge  
United States District Court  
Federal Building and U.S. Courthouse  
100 South Clinton Street  
P.O. Box 7255  
Syracuse, NY 13261-7255

Re: *Car-Freshner Corporation, et al. v. American Covers, LLC, et al., 5:17-cv-171*

Dear Judge Scullin:

We write to clarify the deposition designations filed last week as Exhibit A to Plaintiffs' Witness List (ECF Doc. No. 166-1). Specifically, we write to clarify the identity of the party making each of the deposition designations listed on that Exhibit.

The Exhibit lists "initial designations," "counter-designations," and "rebuttal designations," but does not explicitly identify which party made which designation. The party making each of those designations is as follows:

- All of the "initial designations" are Plaintiffs' designations of the pertinent portions of the deposition testimony they will offer for each of the witnesses named in the Exhibit (and the objections to certain of those designations that are noted on the Exhibit are Defendants' objections to those designations);
- All the "counter-designations" are Defendants' counter-designations (and the objections to certain of those counter-designations that are noted on the Exhibit are Plaintiffs' objections to those counter-designations); and
- All the "rebuttal designations" are Plaintiffs' rebuttal designations, offered in response to Defendants' counter-designations.

Hon. Frederick J. Scullin, Jr.  
June 21, 2022  
Page 2

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC



Liza R. Magley  
LRM/lrm

cc: All Counsel, via ECF